

For Clerk's Office Use

Judge U	Rec'd
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NOV 15 2019

JULIA C. DUDLEY, CLERK
BY: A. Beeson
DEPUTY CLERK

IN THE UNITED STATES DISTRICT
COURT FOR THE WESTERN DISTRICT
OF VIRGINIA

For use by inmates filing a complaint under **CIVIL RIGHTS ACT, 42 U.S.C. §1983**

Josey Ray Edwards

Plaintiff full name

613003247

Inmate No.

v.

CIVIL ACTION NO. 7:19cv00713

Blue Ridge Regional Jail Authority Administrator Tim Trent
Defendant(s) full name(s)

A. Current facility and address: Lynchburg Adult Detention Center

510 Ninth Street P.O. Box 6018 Lynchburg VA 24505

B. Where did this action take place? Lynchburg Virginia

C. Have you begun an action in state or federal court dealing with the same facts involved in this complaint?

☒ Yes ☐ No

If your answer to A is Yes, answer the following:

1. Court: U.S. District Court Western District of VA, Roanoke VA

2. Case Number: 7:19cv00713

D. Have you filed any grievances regarding the facts of this complaint?

☒ Yes ☐ No

1. If your answer is Yes, indicate the result:

Partially Addressed issues in letter, grievances were ignored See Attached

2. If your answer is No, indicate why:

E. Statement of Claim(s): State briefly the facts in this complaint. Describe what action(s) each defendant took in violation of your federal rights and include the relevant dates and places. **Do not give any legal arguments or cite any cases or statutes.** If necessary, you may attach additional page(s). Please write legibly.

Claim #1 – Supporting Facts – Briefly tell your story without citing cases or law:

"See Attached"

Claim #2 – Supporting Facts – Briefly tell your story without citing cases or law:

F. State what relief you seek from the Court. Make no legal arguments and cite no cases or statutes. I ask the Court to grant a preliminary Injunction and/or Temporary Restraining Order, Order Plaintiff's transfer out of BRATA Custody and/or Order Defendant to pay \$50,000 in Compensatory Damages and \$50,000 in Punitive Damages.

G. If this case goes to trial do you request a trial by jury? Yes ☒ No ☐

H. If I am released or transferred, I understand it is my responsibility to immediately notify the court in writing of any change of address after I have been released or transferred or my case may be dismissed.

DATED: 11/12/2019

SIGNATURE: Josely Edmunds

VERIFICATION:

I, Josely Edmunds, state that I am the plaintiff in this action and I know the content of the above complaint; that it is true of my own knowledge, except as to those matters that are stated to be based on information and belief, and as to those matters, I believe them to be true. I further state that I believe the factual assertions are sufficient to support a claim of violation of constitutional rights. Further, I verify that I am aware of the provisions set forth in 28 U.S.C. §1915 that prohibit an inmate from filing a civil action or appeal, if the prisoner has, on three or more occasions, while incarcerated brought an action or appeal in federal court that is dismissed on the grounds that it was frivolous, malicious, or failed to state a claim upon which relief may be granted, unless the prisoner is in imminent danger of serious physical injury. I understand that if this complaint is dismissed on any of the above grounds, I may be prohibited from filing any future actions without the pre-payment of the filing fees. I declare under penalty of perjury the foregoing to be true and correct.

DATED: 11/12/2019

SIGNATURE: Josely Edmunds

Josey Ray Edwards

V.

Civil Action No. 7:19-cv-00713

Blue Ridge Regional Jail Authority

Administrator Tim Trent

Amended Complaint

- 1.) Starting July 2019 I have been denied medical care by Blue Ridge Regional Jail.
- 2.) Request forms and grievances are ignored purposefully. I have submitted multiple grievances to all members of the Administration including the final step Tim Trent, the Sole Defendant.
- 3.) I am having symptoms that include constant exerting Headaches and Pain, dizziness and Extreme fatigue. I have Hepatitis C.
- 4.) In attempts to research actions from a legal standpoint access to the Courts is extremely inadequate.
- 5.) I am only allowed Thirty minutes once per week access to the Law Library. There is no printer, so you have to take notes within this time. Even someone trained would not be able to get anything done.
- 6.) Stationery, Stamps Paper and Pen are not provided aside from indigent writing kits which consist of: (Five Envelopes, Five Sheets of Paper and a golf Pencil) Indigent Kits are for Correspondance with Family and friends, Thus making you choose between two rights.
- 7.) There is no Designated Individual to help with Legal Research.
- 8.) After receiving a disciplinary Hearing Plaintiff attempted to exhaust the Appeals Process. Major ~~Robert~~ Espinoza (No longer Employ or Defendant) answered the first step denying my claims. The final step rest with Blue Ridge Regional Jail Authority Tim Trent which is sent via US Mail.

and postage is Plaintiff's responsibility, Tim Trent never answered final Appeal violating Due Process rights

9.) On November 12, 2019 I received a response (dated November 12 2019 via mail with no postage) to a letter complaining about these issues to Defendant Tim Trent:

10.) Letter is Dated 10/28/2019 and Stamped Received 10/31/2019 by BRRJA Administration. This was my fourth Attempt at Contacting Mr. Trent.

11.) Whether or not Detst Officer(s) are sending my mail and turning in grievances is Unknown

12.) As Relist I asked Tim Trent to move me to a different facility because the problems here are ongoing and is the best available remedy for everyone.

13.) My understanding is this request was denied.

14.) My request for Hepatitis C treatment was denied also. This is known to be false because they do not want to pay the cost of the treatment which can be over \$50,000

15.) While Liver Specialist say that if you have Hepatitis C you need the treatment.

16.) Medical hasn't bothered addressing other symptoms as listed in paragraph 3.

17.) Other issues were ignored in this response letter.

18.) Plaintiff was left in housing area after notifying officers that Plaintiff will suffer harm and was and did suffer harm, out of pure spite and retaliation. Violating my 8th Amendment.

19.) Plaintiff recallege and incorporate by reference paragraphs 1-18

20.) Defendant has Violated Plaintiffs 1st 5th, 6th, 8th and 14th Amendments to the United States Constitution Causing Plaintiff pain, suffering, physical harm and Emotional Distress

21.) Plaintiff has been and will continue to be irreparably injured by the conduct of defendant unless this court grants the Declaratory and Injunctive relief which Plaintiff seeks.

22.) Plaintiff also seeks any additional relief this court deems just, proper, and equitable.

November 12 2019

Respectfully Submitted

Josey Ray Edwards

Lynchburg Adult Detention Center (BRJA)

#61300327

P.O. Box 6018

Lynchburg VA 24505

Josey Ray Edwards
v.

Civil Action No: 7:19cv00713

BRRJA Tim Trent

Defendants (Amended)

Tim Trent

Administrator of Blue Ridge Regional Jail Authority

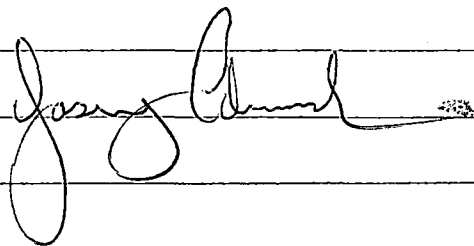
Oversees the Day to Day operations of BRRJA

510 Ninth Street

P.O. Box 6078

Lynchburg VA 24505

November 12 2019

A handwritten signature in cursive script, appearing to read "Josey Ray Edwards". The signature is written in dark ink on lined paper.

Josey Edwards
LAPL
P.O. Box 6018
Lynchburg VA 24508

US District Court
Office of the Clerk

210 Franklin RD RM 540

Reno VA 24011
2401180003 C003

